

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

Diane Schroeder and Rebecca Schroeder,
individually and on behalf of all other
similarly situated individuals,

Case No. 12-cv-00137 WCG

Plaintiffs,

v.

Humana Inc. and
Humana Insurance Company,

Defendants.

PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to General L.R. 79(d), Plaintiffs in the above-captioned case seek an order granting leave to file under seal Exhibit C and Exhibit F attached to the Declaration of Rachhana T. Srey in support of Plaintiffs' Motion for Conditional Class Certification and Court-Authorized Notice Pursuant to 29 U.S.C. § 216(b). In support of this motion, Plaintiffs state as follows:

1. Plaintiffs intend to file their Motion for Conditional Class Certification and Court-Authorized Notice Pursuant to 29 U.S.C. § 216(b) on July 3, 2012.
2. Exhibit C attached to the Declaration of Rachhana T. Srey in support of their motion, is selected pages from the depositions of corporate witnesses of Defendants including the deposition of Defendants' Director of Clinical Operations Betty Weizenicker, the Fed. R. Civ. P. 30(b)(6) deposition of Betty Weizenicker, Michael Hull, and Joan Schinktgen.
3. Exhibit F attached to the Declaration of Rachhana T. Srey in support of their motion, is the "CGO CIT Nurse New Hiring Training Participant Guide" (only the first six pages of the 144-page manual are attached). The "CGO CIT Nurse New Hiring Training Participant

Guide” is specifically referenced on a page designated as “Confidential” in the Deposition of Betty Weizenicker.

4. Defendants recently designated selected pages of these depositions as “Confidential” pursuant to the Protective Order entered in this case on June 29, 2012. (See ECF No. 28.)

5. Plaintiffs’ Exhibit C includes only a few deposition transcript pages which have not been designated as “Confidential” by Defendants. Plaintiffs have included those pages within this request as well because filing these few pages publically would not be a convenient reference for the Court.

6. Accordingly, Plaintiffs hereby request leave to seal Exhibit C and Exhibit F in their entirety.

Date: July 3, 2012

Respectfully Submitted,

s/Rachhana T. Srey
Nichols Kaster, PLLP
Rachhana T. Srey, MN Bar No. 340133
Paul J. Lukas, MN Bar No. 22084X
4600 IDS Center
80 South 8th Street
Minneapolis, MN 55402
Telephone: (612) 256-3200
Fax: (612) 215-6870
srey@nka.com
lukas@nka.com

NICHOLS KASTER, LLP
Robert L. Schug, CA Bar No. 249640
One Embarcadero Center
Suite 720
San Francisco, CA 94111
Telephone: (415) 277-7235
Fax: (415) 277-7238
rschug@nka.com

ATTORNEYS FOR PLAINTIFFS